

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced E911 Emergency)	
Calling Systems)	

To: The Commission

STATUS REPORT
FARMERS MUTUAL TELEPHONE COMPANY

Farmers Mutual Telephone Company, by its attorney, (Reporter), pursuant to the Commission's February 22, 2006, *Order*, FCC 06-16, ¶ 18, hereby submits a status report regarding the 95% location capable handset penetration requirement. In support whereof, the following is respectfully submitted:

(1) The number and status of Phase II requests from PSAPs (including those requests Farmers may consider invalid): Payette County Idaho is the only PSAP requesting Phase II 911 capabilities.

(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by Farmers' network: Payette County was in service for Phase II service in December 2005.

(3) The status of Farmers' coordination efforts with PSAPs for alternative 95% handset penetration dates: Farmers is the database provider for Payette County PSAP. Farmers is in regular contact with Payette County on all 911 issues and Payette County is

aware of our phone replacement plans. There is no formal reporting nor any request for a formal plan from the PSAP at this time.

(4) Farmers' efforts to encourage customers to upgrade to location capable handsets: On February 3, 2006, a letter describing the benefits of a Phase II compliant handset and an offer to discount the phones with a free car charger was mailed to all customers with contract plans still holding non-compliant handsets.

(5) The percentage of Farmers' customers with location-capable phones: Farmers' penetration rate is now 91% (1825 of 1999 handsets are compliant), up from the 85% penetration rate reported in the July 27, 2006, report, up from the 80% reported in Farmers' April 28, 2006, report, and up from October 2005 61% penetration rate reported by Farmers when it sought an extension of the 95% penetration benchmark. *See* February 22, 2006, *Order*, FCC 06-16, n. 27.

(6) Detailed discussion about the efforts made to achieve compliance and whether Farmers is on schedule to meet the extended 95% penetration deadline: Reporter is making follow-up telephone calls to all subscribers who have not yet switched to a location-capable handset. Also, beginning October 11, 2006, Farmers mailed to these customers promotional material which offers a free Kyocera Rave with a 2 year contract extension. Farmers has made significant progress toward migrating reluctant subscribers to GPS capable handsets and if the same rate of change were assumed, it would appear that Farmers is on schedule to meet the February 22, 2007, 95% subscriber penetration requirement. However, because consumer behavior is at issue, progress cannot be guaranteed with mathematical certainty. Each customer conversion is more difficult to achieve than the one before it. That said, Farmers remains committed to achieving the

95% subscriber penetration level.

Respectfully submitted,
FARMERS MUTUAL TELEPHONE COMPANY
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